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**United States District Court for the
Eastern District of Missouri**

United States of America,

Plaintiff,

V.

Richard Gray, Sr.,

Defendant.

Case No. 4:12-cv-00006-RWS

Stipulated Final Judgment of Permanent Injunction Against Richard Gray, Sr.

The United States filed a complaint seeking a permanent injunction against Richard Gray, Sr. (“Gray”) under 26 U.S.C. §§ 7402(a), 7407, and 7408. The United States alleges, in part, that Gray has continually and repeatedly engaged in conduct subject to penalty under 26 U.S.C. §§ 6694, 6695 and 6701 in connection with his preparation of federal income tax returns.

Gray waives the entry of findings of fact and conclusions of law under Federal Rules of Civil Procedure 52 and 65, consents to the entry of this permanent injunction against him, and agrees to be bound by its terms. The parties agree that no provision in this Stipulated Final Judgment of Permanent Injunction constitutes an admission by Gray of any of the allegations set forth by the United States in the foregoing paragraph or in its complaint. Gray understands that the entry of this Stipulated Final Judgment of Permanent Injunction constitutes the final judgment in this matter, and waives the right to appeal from this judgment.

The parties further agree that entry of this Stipulated Final Judgment of Permanent Injunction neither precludes the Internal Revenue Service from assessing penalties against Gray for asserted violations of the Internal Revenue Code nor precludes Gray from contesting such penalties.

Gray further understands and agrees that the Court will retain jurisdiction over this matter for the purpose of implementing and enforcing this injunction and understands that if he violates the injunction, he may be subject to civil and criminal sanctions for contempt of court.

Order


A. **IT IS HEREBY ORDERED** that from the date of this Order, Richard Gray, Sr., and anyone who acts in concert or participation with him and has notice of this Order, is permanently enjoined pursuant to Internal Revenue Code (I.R.C.) (26 U.S.C.) §§ 7402, 7407 and 7408, effective from entry of this Order from directly or indirectly:

- (1) Acting as a federal tax return preparer or requesting, assisting in, or directing the preparation or filing of federal tax returns, amended returns, or other related documents or forms for other persons;
- (2) Advising, assisting, counseling, or instructing anyone about the preparation of a federal tax return;
- (3) Engaging in any other activity subject to penalty under I.R.C. §§ 6694, 6695, 6701, or any other penalty provision in the I.R.C.; or
- (4) Otherwise engaging in any conduct that substantially interferes with the proper administration and enforcement of the Internal Revenue laws.

B. **IT IS FURTHER ORDERED** that the United States is permitted to engage in post-judgment discovery to ensure compliance with the terms of this permanent injunction.

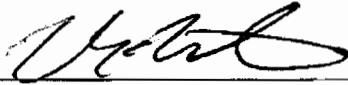
C. **IT IS FURTHER ORDERED** that the Court shall retain jurisdiction over Richard Gray, Sr., and over this action to implement and enforce this Order.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
July 5, 2012

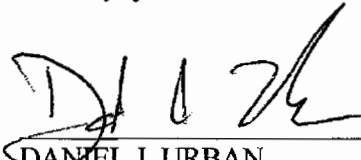
Stipulated and agreed to by:

RICHARD G. CALLAHAN
United States Attorney



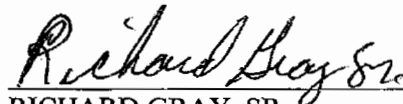
Dated: 1-3-12

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Dated: 12/6/11

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Dated: 12-12-11

RICHARD GRAY, SR.
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Defendant